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Sent: Thursday, October 09, 2014 1:00 PM
To: nprs
Subject: Response to RFI_National Privacy Strategy

Thank you for allowing the public domain to opine on the way forward. Listed below are some of the current barriers we face around privacy:

1. Privacy today cannot be protected because we have defined it incorrectly. A working definition from Gartner is: **Privacy is the ability for an individual person to resist efforts by other entities or people to monitor or influence what the individual thinks, does or can do.**
2. Protecting PII(Personally Identifiable Data) is not the same as protecting Privacy.
3. Current laws focus solely on PII and security controls placed on PII by data stewards but exclude data monetizers.
4. Emerging technologies challenge the relevance of existing regulations as they do not consider Big Data, Internet of Things, Geo-location, Digital behavioral monitoring, Smart meters and sensors, etc.

Vital privacy objectives that should be considered as goals of the strategy are:

1. Purpose specification: Increased transparency around the primary and secondary uses of collected/shared data (that allows the individual to control/opt-in)
2. Use limitation
3. Data Quality
4. Time limits on data retention
5. Individual control (Opt-In, Profile Mgmt)
6. Consumer involvement in policy making
7. Security Safeguards
8. Accountability (Enforcement through incentives or consequences)

Best regards,